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By letter dated November 9, 2021, PACTEC International ("PACTEC") requested relief from flight prohibition Notice to Airmen (NOTAM) KICZ A0029/21, issued by the Federal Aviation Administration (FAA) on August 30, 2021. The FAA requests additional information to be able to consider PACTEC's request fully.

- 1. What airport/airstrip in Afghanistan will PACTEC use as its home base from which to conduct flight operations in the Kabul FIR (OAKX)? What is the date of PACTEC's most recently completed security assessment of this airport/airstrip and was that before or after the Taliban took control of the airport/airstrip?**

PACTEC plans to use Kabul International Airport as its home base. An extensive security assessment has recently been completed. The security assessment started on 5, October and was completed on the 25, October 2021 (after Taliban took control of the airport). The assessment included the city of Kabul as PACTEC's crew will be based in Kabul. Furthermore, the existing PACTEC facilities at the Kabul International Airport, as well as the airport infrastructure, access control, airport facilities, fuel, ATC, and airport management were assessed. This assessment was done by PACTEC's security manager who was in Kabul for the assessment.

- 2. To/From which additional airports/airstrips in Afghanistan does PACTEC seek to operate under its request for relief? For each airport/airstrip, what is the date of PACTEC's most recently completed airport security assessment of the relevant airport/airstrip and was that before or after the Taliban took control of the airport/airstrip??**

Afghanistan's security context has been dynamic for the past few decades. In this context, over a period of 24 years, PACTEC has developed robust security assessment protocols.

Recognizing that even some of the more stable destinations required operational suspension due to security issues, PACTEC developed robust security protocols to continually assess the security at each specific landing strip or airport. Throughout PACTEC's engagement in Afghanistan, many of these aerodromes have been closed and re-opened for PACTEC operations when security conditions changed. PACTEC has at times paused operations at Kabul International airport due to shifts in security.

PACTEC has never operated with the notion that a specific list of aerodromes are cleared for operations, rather, prior to each time an aircraft is scheduled, a risk assessment is completed for that location. By continually assessing aerodrome security PACTEC has never had a single security related event, this track record demonstrates that our security procedures are robust and effective.

- The rest of this response was redacted by PACTEC

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3. What is the planned frequency of PACTEC's proposed operations in the Kabul FIR (OAKX)?

PACTEC's planned frequency of operations is entirely based on NGO demand. PACTEC eventually expects to operate 40-50 legs per month based on user surveys. However, initially, flight operations will be limited as each aerodrome will need to be assessed. Furthermore, because access is limited, NGOs will take time to spool up their operations.

4. For what period of time (i.e., until what date) does PACTEC request relief?

PACTEC requests relief:

- a) Until the security situation warrants the removal of NOTAM A0029/21 or
- b) Until the contract with our primary donor concludes
- c) Until the security situation again deteriorates beyond acceptable security parameters

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5. Provide a summary of the current airport/airstrip security posture for each airport/airstrip in Afghanistan at which PACTEC proposes to operate, including:

- a) What entity or entities are responsible for security, including perimeter security, flight line security, and passenger, baggage, and cargo security screening, at the airports/airstrips of intended operation?**

In Afghanistan PACTEC operates from three different types of aerodromes and with security infrastructure appropriate to the context:

- Aerodromes which have a secure perimeter fence and have security personnel as well as aviation trained security for passenger and baggage screening. These aerodromes are the ones in some of the provincial capitals (Kabul, Herat, Mazar, Kandahar).
- Aerodromes with a perimeter fence and security checks for passengers and baggage done by national/local forces. These aerodromes are not serviced by international carriers although several are served by domestic operators.
- Aerodromes which are remote and serve a very small community. Oftentimes there are local ANSF forces or police at the ramp area, however, they do not normally get involved in passenger or baggage screening. In these communities, the population is very small and security forces know everyone.

Most aerodrome on the list submitted in question #2 fall into the first two categories, a few aerodromes are remote. Even at remote aerodromes, all PACTEC passengers are always (by protocol agreement with the Afghan government) employees of vetted NGOs. PACTEC crew are obligated to screen baggage and verify their identity with a NGO provided ID, or a letter of confirmation of the NGO to be used in conjunction with any other form of ID (national ID card, passport, etc.).

- b) Please describe the security measures currently in place for perimeter security, flight line security, and passenger, baggage, and cargo security screening.**

Answered in "a"

- c) Are these Afghan or foreign government agencies? If not, what is their relationship with the Afghan government or any foreign governments?**

The security forces at most aerodromes are ANSF or local police.

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d) What is the means of communication that PACTEC, the flight crew, and PACTEC's local support personnel would use to communicate with the security element(s) at each airport/airstrip?

- Cell phone (voice and VOIP/Data)
- VHF radio
- Satellite phone/messaging

e) Are these security elements capable of radio communications with the crew/airplane?

At most destinations VHF communications are used. Additionally, airport authorities and NGO staff are trained to contact the PACTEC security team if they have any security concerns. PACTEC dispatch can then communicate directly with the pilot via satellite link. The standard operating procedure prescribes the pilot to receive a satellite message, no more than 15min before ETA in order to proceed to land.

At some of the destination aerodromes, PACTEC may relay information via a MOTCA employed aerodrome agent. This would normally only consist of weather, traffic, and landing/take-off information. While they might be consulted for a general security update, the security assessment is always done in coordination with one of the NGOs or humanitarian relief- or development agencies.

6. Would the proposed operations be conducted under instrument flight rules (IFR), visual flight rules (VFR), or are both IFR and VFR flights possibilities? For VFR operations, what is PACTEC's plan for how its flightcrews would handle unexpected instrument meteorological conditions which they are unable to exit?

- a) All PACTEC flights are conducted VFR
- b) PACTEC pilots are strictly prohibited from operating in IMC. In the event of inadvertent IMC, pilots are trained to proceed promptly to the closest known VMC conditions.
- c) In the event of an inadvertent IMC incident and the aircraft is in proximity of one of the four airports that have a published instrument approach, PACTEC pilots are trained to use those facilities to let down.

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- 7. Would the proposed flights operate during daylight hours only, or does PACTEC propose to conduct both day and night operations? If the flights are proposed to operate during daylight hours only, what are PACTEC's intentions if the flight is delayed into darkness?**

- a) PACTEC operates Day VFR only. PACTEC pilots are prohibited from departing if the flight cannot arrive at the destination 45 minutes before sunset. PACTEC maintains strict departure schedules to maintain our company daylight reserve policy. Passengers are routinely informed that late check-ins will not be accepted, and the aircraft will depart without them.
- b) In the event of a maintenance delay, PACTEC will typically retrieve the crew with another aircraft. If that is not possible due to daylight reserves, PACTEC has arrangements with our humanitarian partners to provide lodging in secured compounds.

- 8. From what source(s) would PACTEC obtain weather briefings, NOTAMS, and how would PACTEC file flight plans under current conditions in Afghanistan?**

PACTEC weather sources comply with FAR 135.213. Additionally, PACTEC uses trained staff from which we receive weather observations at remote aerodromes. The larger airports have weather equipment through which PACTEC gets its weather reports.

The Afghanistan NOTAM office is fully functioning and publishing up-to-date NOTAMs.

Air Traffic Management (ATM) is fully functioning, and flight plans are filed and processed the same way they were before the Taliban takeover. QATAR Airways, Mahan Air, KamAir, UNHAS, and UNAMA have daily international/domestic flights and have no flight plan issues.

- 9. How would PACTEC's crews get up to date flight information publications for Afghanistan?**

The Ministry of Transportation and Civil Aviation (MOTCA) and Air Traffic Management (ATM) are back to functioning in the same way they were before the Taliban take over. Their NOTAM and AIP offices are functioning and keeping Aeronautical Information Publications up to date.

- 10. What is PACTEC's plan for personnel recovery in the event of a downed aircraft?**

- Redacted by PACTEC

- 11. Please describe the aircraft maintenance and other aircraft support services that PACTEC would use, as needed, in conducting the proposed operations.**

-Redacted by PACTEC

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12. Would all operations be conducted same-day, with limited time on ground at remote airports/airstrips, or is PACTEC requesting to remain overnight at airports/airstrips in Afghanistan other than its proposed home base?

- a) All operations are planned to be conducted on the on same day (outbound and inbound). Time on the ground is always kept to the minimum required time. For the unloading, condition check of the aircraft between flights, and renewed loading and required security checks, usually 20-30 minutes are required.
- b) Only due to extenuating circumstances may a pilot and the aircraft RON, i.e. due to technical issues, sudden unforeseen weather changes, etc.

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13. What air routes would PACTEC use to conduct operations between its home base location and other locations in Afghanistan and when arriving into/departing from Afghanistan?

- Redacted by PACTEC

14. At what altitudes does PACTEC plan to fly on these proposed routes?

-Redacted by PACTEC

15. In its submissions to the FAA, PACTEC states the European Union and the Government of Switzerland are requesting PACTEC make every effort to resume operations thereby allowing numerous aid agencies to resume their aid missions in remote districts of Afghanistan. Please provide documentation to support this statement.

-Redacted by PACTEC

16. In its submissions to the FAA, PACTEC indicates that NGOs, donors, and the United Nations are actively requesting PACTEC to start operating again in Afghanistan and are willing to support and lobby on behalf of the organization. Please provide documentation to support this statement.

17. PACTEC asserts a number of aid agencies have indicated a reluctance to resume humanitarian aid in some locations unless PACTEC resumes operations. Please provide documentation to support this statement.

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- 18. PACTEC indicates in its submissions to the FAA that United Nations Humanitarian Air Services (UNHAS) operates in many of the same locations that PACTEC does. Why are PACTEC's services also needed at these locations?**

Redacted by PACTEC

- 19. PACTEC's submissions to the FAA indicate that PACTEC has an agreement with the Civil Aviation Authority of Afghanistan to conduct operations.**

- Redacted by PACTEC

- 20. What steps has PACTEC taken to validate that its network of information sources and operational points of contact for the locations at which it proposes to operate in Afghanistan remains in place and is willing/able to assist PACTEC in conducting the proposed operations?**

For the locations to which PACTEC plans operations, PACTEC has contacted all necessary points of contact needed to obtain good intelligence. Many parts of the networks used are still in place (INSO, UNHAS, ICRC). Contact has also been established with ACAA and airport management at each location. Our local assets providing intelligence remain available and live in the same locations. We have received confirmation from local government leadership that PACTEC has approval to operate.

In line with PACTEC's safety policies and procedures, PACTEC will not operate into remote aerodromes without a vetted local asset nor local government leadership approval.

- 21. Has PACTEC made any changes in its safety or security processes, plans, or procedures based on lessons learned from the rapid Taliban takeover of Afghanistan and the evacuation of many U.S. and foreign citizens and vulnerable Afghans? If so, please describe each of the changes.**

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- 22. Large portions of PACTEC's submissions to the FAA appear to track previous requests for relief verbatim or nearly verbatim. Does any of this information need to be updated to reflect current conditions in Afghanistan?**

PACTEC's security protocols, especially related to airport and flight security proved to be effective during the transition. PACTEC was discontinuing the use of aerodromes well prior to the Taliban's takeover of any of them. PACTEC's security team, along with the rest of the intelligence community underestimated the pace at which Kabul transitioned.

- 23. What specific information in its submissions is PACTEC requesting that the FAA keep confidential and for what reasons?**

PACTEC requests that the following answers be redacted. These responses contain names, addresses and content from our clients that we do not have permission to disseminate. Additionally, PACTEC considers routing and security procedures confidential.

Answers #2, 10, 11, 13-19, 21 and 24-26

- 24. How does PACTEC plan to ensure that it remains able to communicate appropriately with the FAA Flight Standards Office responsible for safety oversight of its operations, taking into account current conditions in Afghanistan and their potential effects on the available means of communication in-country?**

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25. How does PACTEC intend to secure their aircraft while those aircraft are on the ground in Afghanistan, including preventing unauthorized individuals from gaining access to PACTEC's aircraft?

Redacted by PACTEC

26. How does PACTEC intend to provide for the security of their crews while they are on the ground in Afghanistan?

Redacted by PACTEC